

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MASSACHUSETTS

\* \* \* \* \*

LEAH BASSETT,  
Plaintiff

vs.

CIVIL ACTION  
No. 18-cv-10576-PBS

MONICA JENSEN, d/b/a NICA NOELLE;  
JON BLITT, personally and d/b/a MILE  
HIGH MEDIA, d/b/a ICON MALE;  
d/b/a TRANSENSUAL;  
MILE HIGH DISTRIBUTION, INC.;  
ET ALS.

Defendants

\* \* \* \* \*

**PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT**

NOW COMES the Plaintiff, Leah Bassett, and respectfully moves for summary judgment pursuant to Fed. R. Civ. P., Rule 56 against the so-called Mile High-associated Defendants (being those persons or entities identified by name in the above case caption) as to four of the Counts stated in Plaintiff's Verified Complaint; viz. Count Four (Violation of Chapter 93A); Count Five (Civil Conspiracy); Count Seven (Infliction of Emotional and Mental Distress); and Count Nine (Copyright Infringement). The grounds for her Motion are set forth in her Memorandum being filed herewith, and all other materials of record referenced therein; any additional materials or pleadings on file in this case that the Court chooses to review; any matters that the Court may take judicial notice; and, such additional submissions, evidence, and argument as may be presented at or before the Court's hearing and decision on this Motion.

WHEREFORE, Ms. Bassett respectfully requests that the Court:

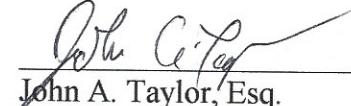
- (1.) Enter judgment in her as to Defendants' respective liability on each of those Counts;

(2.) Enter such other Orders as the Court deems meet and just.

LEAH BASSETT

By her attorney,

Date: December 23, 2019

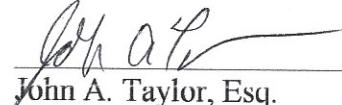
  
John A. Taylor, Esq.  
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Certificate of Compliance with Local Rule 7.1

The undersigned John A. Taylor, Esq. hereby certifies that I provided Defendants' counsel with written notice of my intention to file this Motion and an opportunity to conduct a conference thereto. Neither side thought it would be useful to do so.

Certificate of Service

The undersigned John A. Taylor, Esq. hereby certifies that a copy of this pleading, along with its accompanying Affidavit (with Exhibits), will be transmitted on the above-stated date, electronically to the registered counsel of record as identified on the Notice of Electronic Filing, as well as to those attorneys known to be representing named Co-Defendants in this matter who have not yet filed their respective Appearance.

  
John A. Taylor, Esq.